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April 10, 1995

VIA MESSENGER

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED
APR 10 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: RM-8614, MFS Petition for Rulemaking on Loop Unbundling

Dear Mr. Caton:

Enclosed for filing is an original plus four (4) copies of comments in the rulemaking proceeding referenced above. Please stamp the enclosed "receipt" copy for the messenger to return to our office.

Thank you for your attention with this matter.

Sincerely,



Christy Kunin

CCK/jlr
Enclosures

No. of Copies rec'd 024
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William F. Caton
Acting Secretary
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1919 M Street, N.W.
Washington, D.C. 20554

*Re: MFS Petition For Rulemaking on Unbundling of Local Exchange
Carrier Common Line Facilities (RM-8614)*

Dear Mr. Caton:

FiberLink, Inc. ("FiberLink") supports Metropolitan Fiber System's (MFS's) Petition for Rulemaking on Unbundling of Local Exchange Common Carrier Line Facilities, RM-8614, filed with the Commission March 7, 1995. FiberLink, like many other companies, seeks to provide competitive local exchange services in various jurisdictions throughout the country that have authorized or are considering authorization of local competition. Yet, today most jurisdictions do not provide the necessary competitive conditions for prompt entry and provision of service. The Commission is in the best position to elicit comments and establish rules and guidelines to expedite the introduction of competition into the local exchange.

As MFS accurately demonstrates, unbundling of the local loop is the key to the future of competition in the local exchange market. The Petition raises numerous competitive considerations that must be considered and addressed in the development of a competitive local exchange environment. The introduction of local exchange competition, like the development of competition for customer premises equipment and long distance services, has the potential to allow telephone service customers to realize the myriad benefits attending a truly competitive market. Yet, as MFS observes, despite the removal of barriers to competition, competitors must be able to access the local loop on an unbundled basis, and under reasonable terms and conditions, if they are to successfully offer consumers competitive alternatives to the incumbent local exchange companies.

The Commission should open a docket to consider these issues immediately, and should not decline to do so simply because of parties' concerns regarding the ultimate outcome of the proceedings. Parties will have ample opportunity to describe their concerns in their Comments in the docket.

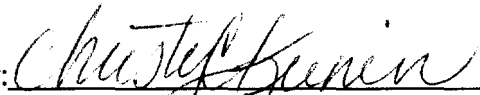
BLUMENFELD & COHEN

William F. Caton
Acting Secretary
Federal Communications Commission
April 10, 1995
Page 2

As state commissions throughout the country tackle the issues involved in the introduction of competition into the local exchange, the timing is ripe for the Commission to exercise its jurisdiction to deal with the fundamental issues of network architectures and interrelationships raised by local exchange competition. Consequently, it is not only appropriate but essential that the Commission immediately commence a rulemaking proceeding to elicit industry comment on these issues raised in the Petition for Rulemaking and expedite its decision making process to assure the rapid and effective introduction of competition into the last bastion of monopoly telecommunications services.

Respectfully submitted,

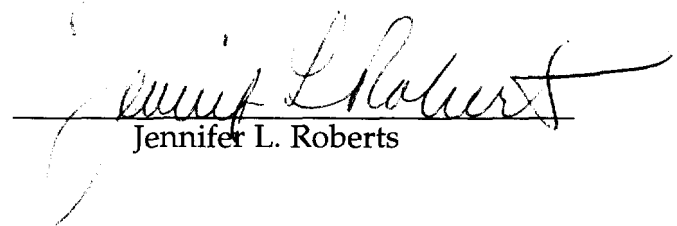
J. Scott Bonney
Vice President
Regulatory & External Affairs
FiberLink

By: 
Jeffrey Blumenfeld
Christy C. Kunin

Attorneys for FiberLink

CERTIFICATE OF SERVICE

I, Jennifer L. Roberts, do hereby certify on this 10th day of April, 1995, that I have served a copy of the foregoing document via hand-delivery to the following:



Jennifer L. Roberts

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Common Carrier Bureau
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